

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

## **SOVEREIGN PEAK VENTURES, LLC,**

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**Plaintiff,**

## **JURY TRIAL DEMANDED**

V.

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**LG ELECTRONICS, INC., and  
LG ELECTRONICS U.S.A., INC.,**

§ CIVIL ACTION NO. 2:20-CV-00107-JRG  
§ (CONSOLIDATED LEAD)  
§ CIVIL ACTION NO. 2:20-CV-00108-JRG  
§ CIVIL ACTION NO. 2:20-CV-00109-JRG

## Defendants.

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## **JOINT STIPULATION FOR DISMISSAL WITH PREJUDICE**

Plaintiff Sovereign Peak Ventures, LLC (“SPV”) and Defendants LG Electronics Inc., and LG Electronics U.S.A., Inc. (collectively, the “Parties”) have reached a settlement of all matters in controversy in the above-captioned consolidated cases. Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), the Parties hereby stipulate to the dismissal of all of their claims against one another in the above-captioned consolidated cases **WITH PREJUDICE**, subject to the terms of the settlement agreement entered between the Parties.

The Parties ask that the Court enter the attendant proposed Order of Dismissal, with each party to bear its own costs, expenses and attorneys' fees.

Dated: November 24, 2020

Respectfully submitted,

<p><u>/s/ Patrick J. Conroy</u> Patrick J. Conroy Texas Bar No. 24012448 T. William Kennedy Jr. Texas Bar No. 24055771 Daniel F. Olejko Texas Bar No. 24108897 Jonathan H. Rastegar Texas Bar No. 24064043 Jerry D. Tice II Texas Bar No. 24093263 Hunter S. Palmer Texas Bar No. 24080748</p> <p><b>BRAGALONE CONROY PC</b> 2200 Ross Avenue Suite 4500W Dallas, TX 75201 Tel: (214) 785-6670 Fax: (214) 785-6680 pconroy@bcpc-law.com bkennedy@bcpc-law.com dolejko@bcpc-law.com jrastegar@bcpc-law.com jtice@bcpc-law.com hpalmer@bcpc-law.com</p> <p><i>Attorneys for Sovereign Peak Ventures, LLC</i></p>	<p><u>/s/ Allan A. Kassenoff with permission</u> Melissa R. Smith Andrew T. Gorham GILLAM &amp; SMITH, LLP 303 South Washington Avenue Marshall, TX 75670 Telephone: (903) 934-8450 Facsimile: (903) 934-9257 Email: melissa@gillamsmithlaw.com Email: tom@gillamsmithlaw.com</p> <p>Richard A. Edlin Allan A. Kassenoff Elana B. Araj GREENBERG TRAURIG, LLP MetLife Building, 200 Park Avenue New York, NY 10002 Telephone: (212) 801-9200 Facsimile: (212) 801-6400 Email: edlinr@gtlaw.com Email: kassenoffa@gtlaw.com Email: araje@gtlaw.com</p> <p>Vivian S. Kuo GREENBERG TRAURIG, LLP 2101 L Street NW, Suite 1000 Washington, DC 20037 Telephone: (202) 331-3158 Email: kuov@gtlaw.com</p> <p>Andrew R. Sommer GREENBERG TRAURIG, LLP 1750 Tysons Boulevard, Suite 1000 McLean, VA 22102 Telephone: (703) 749-1370 Email: sommera@gtlaw.com</p> <p><i>Attorneys for Defendants LG Electronics Inc. and LG Electronics USA, Inc.</i></p>
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**CERTIFICATE OF SERVICE**

I certify that on November 24, 2020, the foregoing document was served on counsel of record via email.

*/s/ Patrick J. Conroy*  
Patrick J. Conroy